



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**JUN 23 2016**  
Via Electronic Mail

Mr. Fred J. Smalling  
Americas Styrenics  
605 Crenshaw Blvd  
Torrance, California 90503

**Re: Remedial Action Plan – Surrounding Areas and Train 5**

Dear Mr. Smalling

Thank you for working with the U.S. Environmental Protection Agency, Region 9 (USEPA) to address the cleanup of PCBs found on Americas Styrenics Train 5 and the areas immediately surrounding Train 4 and Train 5, located at 305 Crenshaw Blvd Torrance, California 90503 (site). The USEPA received and reviewed Americas Styrenics April 2016 *Remedial Action Plan – Surrounding Areas and Train 5* (work plan) prepared by Environmental Resource Management (ERM). The work plan was written based on the additional characterization conducted by Americas Styrenics as prescribed by conditions 9 and 10 of the USEPA conditional approval “Self-Implementing Cleanup Plan Train 4” dated January 22, 2014. The workplan describes the characterization, cleanup plan, and verification sampling and analysis plan for Train 5 and the areas immediately surrounding Train 4 and Train 5.

Train 5 had very little PCB impacts compared to Train 4. Train 4 had PCB Bulk Product from paint, or primer or both, and total PCB concentration greater than 50 ppm in concrete, paint, and other bulk materials. Train 5 had no impacts of PCBs greater than 50 ppm and no identifiable PCB bulk product. The area that surrounds Train 4 and train 5 had one PCB impact greater than 50 ppm in asphalt.

Americas Styrenics had completed a risk evaluation for Train 4 to evaluate alternate cleanup goals. Both Train 4 and Train 5 are approximately identical in build, structure, and operation. They share maintenance and personnel, and are both considered low occupancy areas. Based on this knowledge, the USEPA is allowing Americans Styrenics to apply the same cleanup goals based on the Risk Assessment previously approved by the USEPA dated June 26, 2014. Americas Styrenics has also completed a human health risk evaluation to address leaving PCBs in the asphalt that surround both Train 4 and Train 5. Based on the risk evaluations, Americas Styrenics proposes separate cleanup goals for the type of media present.

The cleanup goal for painted non-porous surfaces will be  $\leq 10\mu\text{g}/100\text{cm}^2$  total PCBs based on the arithmetic mean of all samples collected with no single sample exceeding  $140\mu\text{g}/100\text{cm}^2$  total PCBs. The cleanup goal for asphalt that surrounds the immediate area of Train 4 and Train 5 is  $< 10$  ppm total PCBs. Americas Styrenics has submitted this cleanup plan under the provision provided in the Toxic Substance Control Act 40 CFR 761.61(c). The USEPA is approving the workplan under 40 CFR 761.61(c) risk based cleanup, with the following conditions.

**A. USEPA Conditions of Approval**

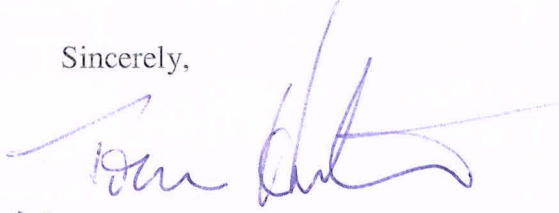
1. **Land Use Covenant.** America Styrenics shall include in the Land Use Covenant all PCBs known to be left on site including but not limited to soils, concrete, and asphalt.

This conditional approval does not relieve the owner, Americas Styrenics from complying with all other applicable federal, state, and local regulations and permits. Departure from the approval without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

This approval only applies to the Americas Styrenics Train 5 and the areas surrounding Train 4 and Train 5 located on the facilities grounds at 305 Crenshaw Boulevard Torrance, California. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the site if new information during additional site characterization, cleanup verification, and/or during future post-cleanup activities (e.g., redevelopment and post redevelopment) at the property shows that PCBs remain at the site above the approved PCB cleanup level. In addition, USEPA may require cleanup in areas immediately adjacent to the site if those areas are found to be impacted by PCBs.

USEPA appreciates the opportunity to assist Americas Styrenics on the PCB cleanup being approved here under 40 CFR 761.61(c). If you have any questions regarding this approval please contact George Randell at 415.972.3439. Thank you for your cooperation.

Sincerely,



for Jeff Scott, Director  
Waste Management Division

**Cc Via Electronic Mail Only**

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